



March 19, 2019

via ECFS and e-mail

Marlene H. Dortch
Secretary, Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

**Re: Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities • CG Docket No. 03-123
Misuse of Internet Protocol (IP) Captioned Telephone Service
CG Docket No. 13-24**

Dear Ms. Dortch,

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), the Hearing Loss Association of America (HLAA), the National Association of the Deaf (NAD), and the California Coalition of Agencies Serving the Deaf and Hard of Hearing (CCASDHH) (Consumer Groups) support the proposal of the Joint Providers of IP CTS—Hamilton Relay, Sprint, CaptionCall, and Mezmo Corp.—to extend the interim IP CTS compensation rate of \$1.75 per minute through the 2019-2020 Fund Year.¹

Section 225 requires that the Commission’s regulations facilitate functionally equivalent IP CTS call quality.² The Commission should reimburse IP CTS providers at a rate sufficient to ensure a robust and competitive marketplace of providers that will ensure a high level of service quality for people who rely on captioning when placing important phone calls, including emergency calls.

The Joint Provider proposal advocates for extending the interim rate of \$1.75 per minute until June 30, 2020, when the Commission should reconsider the appropriate compensation

¹ Ex Parte of Hamilton Relay, Sprint, CaptionCall, and Mezmo Corp. (“Joint Providers”), CG Docket Nos. 13-24 & 03-123 at 1 (Feb. 28, 2019) (“Joint Providers Ex Parte”), <https://www.fcc.gov/ecfs/filing/10228948804794>; *see also* Ex Parte of Hamilton Relay, Sprint, CaptionCall, and Mezmo Corp., CG Docket Nos. 13-24 & 03-123 (March 15, 2019), <https://www.fcc.gov/ecfs/filing/103152954700202>.

² *See* 47 USC § 225(b)(1); *see also* Comments of Consumer Groups, Notice of Inquiry, CG Docket Nos. 13-24 & 03-123 at 4-5 (Oct. 16, 2018), <https://www.fcc.gov/ecfs/filing/1016178423024>.

rate.³ The iTRS Advisory Council supports this proposal, recommending it as the best solution for IP CTS consumers.⁴ We agree. Consistent rates provide the most opportunity for consumer choice by ensuring that providers are able to stay in the market and that the resulting competitive landscape places new entrants on equal footing with incumbent IP CTS providers.

Respectfully submitted,

/s/

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CC: Michael Scott, Consumer and Governmental Affairs Bureau

³ Joint Providers Ex Parte at 1.

⁴ Ex Parte of Rolka Loube, CG Docket Nos. 03-123 & 13-24 at 3-4 (Dec. 4, 2019) <https://www.fcc.gov/ecfs/filing/1204051341584> (finding that the Commission's proposed rate of \$1.58 per minute does not cover all providers' costs and may force some providers out of the market).